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THE CITY OF NEW YORK  
LAW DEPARTMENT  
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So ordered. The status  
conf. is adjourned from  
April 1 to July 8, 2022,  
10<sup>00</sup> am. No further

extensions.  
3-21-22

March 16, 2022

**BY ECF**

Honorable Alvin K. Hellerstein  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Jabbar Richardson v. City of New York, et al., 21 Civ. 622 (AKH)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Honorable Sylvia Hinds-Radix, Corporation Counsel of the City of New York, and the attorney representing Defendants City of New York, Darrion Grant, Eduardo Perezromero, Thomas Tubolino, Robert Czaplinski, and Lawrence Lechmanski (collectively, "City defendants") in the above-referenced matter.<sup>1</sup> City defendants write to respectfully request that the Court grant a ninety-day extension, from March 18, 2022 to June 16, 2022, to complete fact discovery, and to seek a corresponding adjournment of the second case management conference, currently scheduled for April 1, 2022 at 10:00 a.m. This request is submitted with the consent of all parties.

By way of background, plaintiff alleges, *inter alia*, that, on October 27, 2019, he was falsely arrested by members of the New York City Police Department. On September 14, 2021, the parties entered a case management plan indicating March 18, 2022 as the close of fact discovery. Since then, the parties have exchanged initial disclosures, conducted certain paper discovery, and have been actively engaging in settlement discussions. The parties, however, require additional time to continue settlement discussions and, if unsuccessful, to complete paper discovery and depositions.

For the reasons set forth above, City defendants respectfully request that the Court grant a ninety-day extension, from March 18, 2022 to June 16, 2022, to complete fact discovery.

<sup>1</sup> Pursuant to the Court's Order dated October 25, 2021, defendant Pedro Flores's obligation to answer or otherwise respond to the Second Amended Complaint is stayed pending his discharge from military service. (JCF No. 61.)

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and also seek a corresponding adjournment of the April 1, 2022 second case management conference to be scheduled after the current proposed fact discovery deadline on a date convenient to the Court.

City defendants thank the Court for its consideration of this application.

Respectfully submitted,

/s/ Amanda M. Rolon  
Assistant Corporation Counsel  
Special Federal Litigation Division

**BY ECF**

*All counsel of record*